

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

DOLLAR GENERAL CORPORATION,

Defendant.

Civil Action No. 3:12-cv-670-HTW-LRA

DECLARATION OF AHNAF BASHIR

Pursuant to 28 U.S.C. § 1746, I, Ahnaf Bashir, declare the following:

1. My name is Ahnaf Bashir. I am employed by Dollar General Corporation (“DGC”) as Field Human Resources Director. I am over the age of 18 and am competent to make this Declaration. In my capacity as Field Human Resources Director, I have personal knowledge of the facts stated herein, based on my review of personnel records that are made, maintained and stored in the ordinary course of business. I am over the age of 18, am competent to testify and have personal knowledge of the following facts:

2. DGC operates a Store Support Center in Goodlettsville, Tennessee, where personnel and human resources records are centrally stored and maintained for retail operating entities, including Dolgencorp, LLC, which is the entity that employs employees at Dollar General stores that are located in the state of Mississippi.

3. Dollar General Store No. 10687 is located in Long Beach, Mississippi (“Store No. 10687”) and employs the individuals who work at that location.

4. Business records, human resources records and personnel files related to current and former employees of Store No. 10687 are not maintained in Jackson, Mississippi. Most

EXHIBIT
A

personnel records are maintained at the Store Support Center and certain store business and personnel information may be maintained at the Store No. 10687 in Long Beach.

5. I have reviewed certain human resources data related to current and former employees assigned to Store No. 10687 in Long Beach, Mississippi. According to this information, Demetrice Hersey ("Hersey") has only been employed by Dolgencorp, LLC at one store, Dollar General Store No. 10687, located in Long Beach, Mississippi.

6. The last known address for Demetrice Hersey maintained in the human resources records is 1113 Hickory Drive Apt B, Long Beach, Mississippi 39560.

7. Based on my review of these employment records, the Assistant Store Managers assigned to Store No. 10687 from January 2009 through May 2011 include the following individuals, with the cities of residence of their last known addresses in parentheses:

- Shirley Aldrich (Pass Christian, MS);
- Sarah Garriga (Saucier, MS);
- Rachel Montefusco (Long Beach, MS); and
- April Moore (Perkinston, MS).

8. Of the employees listed in the paragraph above, only one (Sarah Garriga) is actively employed by Dolgencorp, LLC, and records do not indicate that any of the individuals are presently or are known to have last resided in Jackson, Mississippi.

9. Human resources records show that Hersey's other co-workers assigned to Store No. 10687, and still employed there at the time of Hersey's resignation in May 2011, include the following individuals, with the cities of residence of their last known addresses in parentheses:

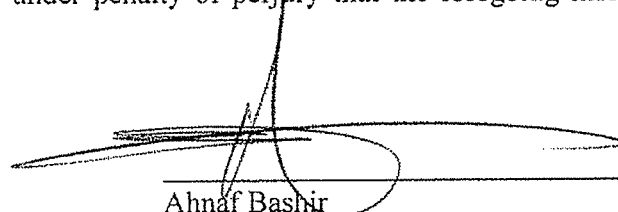
- Mary Newell (Long Beach, MS);
- Dale Jones (Long Beach, MS);

- Danielle Miller (Pass Christian, MS);
- Roberta Ramirez (Long Beach, MS);
- Rebecca McCaskill (Long Beach, MS); and
- Timothy Barnes (Long Beach, MS);

10. Of the employees listed in the paragraph above, only one (Dale Jones) is actively employed by Dolgencorp, LLC, and records do not indicate that any of the individuals are presently or are known to have last resided in Jackson, Mississippi.

11. Human resources records reflect that Hersey's Store Manager, Charlene O'Neal, presently resides and works in Long Beach, Mississippi.

12. I hereby declare under penalty of perjury that the foregoing information is true and correct.



Ahnaf Bashir

1/21/13

Date